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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF STATE POLICE

HEADQUARTERS: P.O. BOX 185, NORTH SCITUATE, RHODE ISLAND

OFFICE OF THE SUPERINTENDENT

EDMOND S. CULHANE, JR.

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MAY 17 1993

May 13, 1993

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MAY 18 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC - MAIL ROOM

Ms. Donna R. Scarce, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Scarce:

I find it necessary to register my concerns as to the possible impact Proposed Rulemaking under 92-235 may have on the State of Rhode Island.

While refarming may be one method of making additional radio frequencies available, it is most likely the majority of those frequencies would be licensed and utilized by the commercial market. Public Safety Entities would, again, find themselves shortchanged in an area critical to all categories of emergency response.

New England would be particularly hard hit by the requirements of these rules. The narrowing of bandwidths and resulting loss is, by itself, unacceptable to the public safety community. To require Effective Radiated Power (ERP) reductions to 5 watts is simply unacceptable.

The topography of Rhode Island, and the New England States in general, makes it impossible to comply with the requirements of these rules. The number of additional radio sites necessary to provide adequate communications under these rules would result in millions of dollars of State expenditures in New England alone. Further, the environmental considerations are staggering in an area such as New England. At a time when we are being encouraged to reduce and consolidate the number of electronic sites currently used, adding sites will almost certainly meet with strong opposition.

As the Superintendent of the Rhode Island State Police, I respectfully urge you not to adopt any provisions suggested in proposed rules under 92-235 until reasonable, cost effective alternatives are available to the public safety and emergency response community.

Sincerely,

Edmond S. Culhane, Jr.
Colonel
Superintendent

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